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November 25, 2015

VIA CM/ECF

Hon. Michael A. Hammer, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *WAG Acquisition, L.L.C. v. Sobonito Investments, Ltd., et al.*,
Civil Action No. 2:14-cv-01661 (ES)(MAH)

Your Honor:

This is a joint letter, on behalf of both sides in this matter, concerning jurisdictional discovery in this case. The parties have met and conferred on these issues, and agree as to the matters addressed herein.

We represent defendants Coolvision, Ltd. and I.M.L. SLU (individually, "Coolvision," and "I.M.L.," collectively, "Defendants") in the above referenced action, and write on behalf of Defendants and plaintiff WAG Acquisition, L.L.C. ("WAG") to request that the Court broaden the current ongoing "limited jurisdictional discovery" of Coolvision to also include limited jurisdictional discovery of I.M.L. (D.E. 66, p. 24), and toll I.M.L.'s time for responsive pleading until completion of the same. This, in turn, will allow Defendants to present the Court with a single, joint motion to dismiss as to both Coolvision and I.M.L., as opposed to filing two motions on two different motion cycles for each defendant on related issues.

The parties have conferred and believe that an efficient way to proceed here would be (1) to extend the time for I.M.L. to respond to the complaint so that I.M.L. does not file its motion to dismiss on December 2, 2015, (2) permit WAG to take limited personal jurisdictional discovery as to I.M.L. at the same time that it conducts such discovery as to Coolvision, and (3) at the conclusion of such jurisdictional discovery, Defendants Coolvision and I.M.L. will file a joint motion to dismiss.

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The parties believe that this efficient approach may be applied regardless whether the Court decides to adjourn the Rule 16 order that is the subject of the parties' letters of November 17th and 18th (D.E. 76-78).

In order to prevent the broadening of jurisdictional discovery to include I.M.L. from delaying this action, the parties have agreed to an expedited discovery schedule. WAG shall serve I.M.L. with the same discovery requests that it served on Coolvision by November 25, 2015. I.M.L. will respond to the requests by December 7th, and both Coolvision and I.M.L. will produce their responsive documents on or about December 14.

The remainder of the schedule for jurisdictional discovery can be set either by agreement or at the next conference before this Court.

For these reasons, I.M.L. respectfully requests that its time to answer, reply, or otherwise respond to the Second Amended Complaint be tolled until the completion of limited jurisdictional discovery on the schedule set forth above as to Defendants Coolvision and I.M.L., so that Defendants may file a joint motion to dismiss. If Your Honor finds the same acceptable, we ask that you "So Order" this letter.

Respectfully submitted,

/s/ Michael A. Innes

Michael A. Innes

SO ORDERED

s/ Michael A. Hammer
Michael A. Hammer, U.S.M.J.

Date: 11/30/2015

MAI/cm

cc: ALL COUNSEL OF RECORD (via CM/ECF)